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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: HIGH-TECH EMPLOYEE ANTITRUST
LITIGATION

Case No. 5:11-cv-2509

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF JOSEPH R. SAVERI
IN SUPPORT OF JOSEPH SAVERI LAW
FIRM, INC.'S MOTION TO ENLARGE
TIME**

1. I am an attorney licensed in the State of California and admitted to practice in the Northern District of California. I am the founder of Joseph Saveri Law Firm, Inc. ("JSLF"), Co-Lead Counsel for the Class Representatives and the proposed Settlement Class. I have personal knowledge of the facts set forth herein and could competently testify to them if called as a witness.

2. Pursuant to Local Rule 6-3, I submit this Declaration in support of the Joseph Saveri Law Firm, Inc.'s Motion to Enlarge Time.

3. On July 9, 2015, the Court ordered that JSLF and Lieff Cabraser Heimann & Bernstein, LLP ("LCHB") jointly submit a document on July 16, 2015, summarizing entry-by-entry disputes concerning time previously submitted by JSLF.

4. On Monday, July 13, 2015, at a time convenient to LCHB, JSLF and LCHB held a meet and confer discussion concerning JSLF's time entries. The meeting lasted approximately from 1:30pm until 7:00pm. At that meeting, LCHB raised a number of criticisms regarding JSLF's time. The

1 criticisms related to hundreds of time entries—nearly all of which had never been previously raised
2 with JSLF.

3 5. Further, at the July 13, 2015 meeting, LCHB informed JSLF that it had prepared a
4 declaration it intended to file. LCHB offered to show me the declaration at the meeting, but stated that
5 it would not allow JSLF to retain a copy. I stated that the meeting would be more productive if LCHB
6 and JSLF went through the time entry-by-entry, as requested by the Court. LCHB responded by
7 offering to show me the declaration the following day, and I accepted this offer.

8 6. At approximately 11:00am, on July 14, 2015, LCHB presented to me a 28-page
9 declaration that had twenty attachments (one of which was not provided to JSLF). I stated that the
10 Declaration concerned matters outside the filing the Court ordered LCHB and JSLF to prepare. Later in
11 the day, LCHB provided JSLF a draft copy of the Declaration and exhibits.

12 7. Since July 13, 2015, JSLF attorneys have devoted dozens of hours reviewing materials
13 related to its work in this case and the criticisms raised by LCHB. On the evening of July 14, 2015, in
14 an effort to facilitate an efficient process for resolving the disputes, JSLF provided LCHB with a chart
15 that identified the entries at issue, and included a short hand for the criticisms. The chart had a blank for
16 objections, which LCHB was to fill in, that supported LCHB's request to exclude the time.

17 8. Despite many requests, LCHB did not provide written objections until 9:49pm on
18 Wednesday, July 15, 2015. The objections provided in writing differed from the objections provided
19 orally. JSLF was not on notice of the issues raised in the written objections because prior to Monday
20 LCHB had not raised these issues with JSLF.

21 9. Through the exchange of information, LCHB and JSLF have been able to narrow the
22 entries in dispute by over 100 entries. JSLF believes that further discussion between the parties could
23 substantially narrow the entries in dispute. JSLF also needs additional time to respond to LCHB's
24 objections, and the Declaration provided to JSLF, if LCHB files it. To date, LCHB's position has been
25 a moving target.

26 10. JSLF has requested that LCHB agree to an extension of time, but as of the morning of
27 July 16, 2015, LCHB has not agreed.
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